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4 Attorney for Defendant  
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7 UNITED STATES DISTRICT COURT  
 8 CENTRAL DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA, ) Case No.: 2:06-cr-00530-FMC-2  
 10 Plaintiff, )  
 vs. ) DEFENDANT'S *EX PARTE* APPLICATION  
 11 ) FOR EXTENSION OF TIME TO PAY  
 GREG WONG ) RESTITUTION  
 12 Defendant. )  
 13 ) Hon. Florence-Marie Cooper  
 14 )

15 Defendant Greg Wong, by and through his attorney, Eric A. Chase, submits this *ex parte*  
 16 application ("Application") to request additional time in which to make the restitution payment  
 17 of \$250,000 ordered by the Court. This Application is based on the grounds that Defendant has  
 18 been unable to obtain the necessary financing to pay restitution. Defendant respectfully asks the  
 19 Court to extend the deadline by which his restitution payment of \$250,000 is due to September 1,  
 20 2009.

21 **DISCUSSION**

22 This Court sentenced Defendant on December 10, 2008, to 3 years of probation. As a  
 23 condition of probation, the Court ordered the Defendant to be placed on home detention for 12  
 24 months, perform 200 hours of community service, and make a partial restitution payment of  
 \$250,000 and a monthly payment of at least \$200 for the duration of supervised release. The  
 25 Court ordered Defendant to be jointly and severally liable with his co-defendants for the total  
 26 restitution amount of \$2,897,893.00, but made a finding that "the defendant's economic  
 27 circumstances do not allow for either immediate or future payment of the amount ordered."

The Court specified that Defendant pay the \$250,000 partial restitution within 60 days after sentencing. On February 6, 2009, an attorney for Defendant wrote a letter to Probation Officer Consiglio advising her that he is working on obtaining financing to make the restitution payment and that he requires additional time to secure said funds. That deadline was then extended to July 1, 2009. However, Defendant has still been unable to obtain the moneys for the restitution payment.

Defendant has recently retained the law firm of United Defense Group, LLP, to assist him in, *inter alia*, obtaining financing to pay his restitution obligations. Defendant's new attorneys expect that funds will be available within 30 days but request 2 months in the event that delays arise.

WHEREFORE, Defendant asks this Court to grant this Application and extend the restitution payment date to September 1, 2009.

Respectfully Submitted,  
UNITED DEFENSE GROUP, P.C.

By: /s/ Eric A. Chase

Eric A. Chase  
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Attorney For Defendant,  
GREG WONG

1 **CERTIFICATE OF SERVICE**

2 I, Oren Rosenthal, hereby declare:

3 That I am a citizen of the United States and employed in Los Angeles County, California;  
4 that my business address is United Defense Group, LLP, 4181 Sunswept Dr., Suite 100, Studio  
5 City, CA 91604; that I am over the age of eighteen years, and am not a party to this action.

6 That on July 1, 2009, I served a copy of DEFENDANT'S *EX PARTE APPLICATION*  
7 FOR EXTENSION OF TIME TO PAY RESTITUTION as follows:

8 Via Facsimile:

9 Deborah Yniguez Consiglio  
United States Probation Officer  
10 Fax: 626-814-8639

11  
12 /s/  
13 Oren Rosenthal  
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